

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Reading Division

IN RE: KYLE JOSEPH DOMITROVITS BRITTANY KRISTEN DOMITROVITS aka BRITTANY KRISTEN MESSENIERHNER	Case No. 18-12926-pmm
FREEDOM MORTGAGE CORPORATION, Movant	Chapter 13
vs.	
KYLE JOSEPH DOMITROVITS BRITTANY KRISTEN DOMITROVITS aka BRITTANY KRISTEN MESSENIERHNER, Debtor	

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

FREEDOM MORTGAGE CORPORATION has filed a Motion to Allow Loan Modification and for Approval to Execute and Record Partial Claim Agreement with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before January 14, 2022 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court
The Gateway Building
201 Penn Street, 4th Floor
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Brock and Scott, PLLC
8757 Red Oak Boulevard, Ste 150
Charlotte, NC 28217

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the approval requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia Mayer on January 20, 2022 at 11:00 am, in The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (610) 208-5030 to find out whether the hearing has been cancelled because no one filed an answer.

This is the 29th day of December 2021.

Brock and Scott PLLC

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

BROCK & SCOTT, PLLC

302 Fellowship Road, Suite 130

Mount Laurel, NJ 08054

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IN RE:

KYLE JOSEPH DOMITROVITS
BRITTANY KRISTEN DOMITROVITS
aka BRITTANY KRISTEN MESSENIEHNER

Case No. 18-12926-pmm

FREEDOM MORTGAGE CORPORATION,
Movant

Chapter 13

vs.

KYLE JOSEPH DOMITROVITS
BRITTANY KRISTEN DOMITROVITS
aka BRITTANY KRISTEN MESSENIEHNER,
Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Hearing and Motion to Allow Loan Modification and for Approval to Execute and Record Partial Claim Agreement has been electronically served or mailed, postage prepaid on December 29, 2021 to the following:

KYLE JOSEPH DOMITROVITS
1028 HOGAN WAY
NORTHAMPTON, PA 18067-2701

Charles Laputka, Debtor's Attorney
Laputka Law Office
1344 W. Hamilton St
Allentown, PA 18102
claputka@laputkalaw.com

Scott F. Waterman, Bankruptcy Trustee

Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606
ECFMail@ReadingCh13.com

December 29, 2021

/s/ Andrew Spivack
Andrew Spivack
(Bar No. 84439)
Attorney for Creditor
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302 Fellowship Road, Suite 130
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Telephone: 844-856-6646 x3017
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